IN THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA CHARLESTON DIVISION

IN RE: ETHICON, INC. PELVIC REPAIR
SYSTEMS PRODUCTS LIABILITY
LITIGATION

THIS DOCUMENT RELATES TO:

ETHICON WAVE 4 CASES LISTED IN
EXHIBIT A

Master File No. 2:12-MD-02327
MDL 2327

JOSEPH R. GOODWIN U.S. DISTRICT
JUDGE

NOTICE OF ADOPTION OF PRIOR DAUBERT MOTION OF RUSSELL DUNN, PH.D. FOR WAVE 4

Comes now, the Defendants, and hereby adopt and incorporate by reference the Daubert motion filed against Russell Dunn, Ph.D. for Ethicon Wave 3 Dkt. [2775 (motion), 2778 (memorandum in support)]. Defendants respectfully request that the Court exclude Dr. Dunn's testimony, for the reasons expressed in the Wave 3 briefing. This notice applies to the Wave 4 cases identified in Exhibit A attached hereto.

Respectfully submitted,

/s/Christy D. Jones
Christy D. Jones
Butler Snow LLP
1020 Highland Colony Parkway
Suite 1400 (39157)
P.O. Box 6010
Ridgeland, MS 39158-6010
(601) 985-4523
christy.jones@butlersnow.com

/s/ David B. Thomas

David B. Thomas (W.Va. Bar #3731) Thomas Combs & Spann PLLC 300 Summers Street Suite 1380 (25301) P.O. Box 3824 Charleston, WV 25338 (304) 414-1807 dthomas@tcspllc.com

COUNSEL FOR DEFENDANTS ETHICON, INC., ETHICON, LLC AND JOHNSON & JOHNSON

CERTIFICATE OF SERVICE

I hereby certify that on this day I electronically filed the foregoing document with the Clerk of the court using CM/ECF system which will send notification of such filing to the CM/ECF participants registered to receive service in this MDL.

/s/Christy D. Jones
Christy D. Jones

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